

IN THE UNITED STATES BANKRUPTCY COURT FOR
THE SOUTHERN DISTRICT OF MISSISSIPPI

IN THE MATTER OF:

CHAPTER 13 NO.:

MELVIN MARSHALL THAGGARD
LACRYSTAL APRIL RHYNES

19 - 03455 - NPO

TRUSTEE'S MOTION TO DISMISS

COMES NOW Trustee, Harold J. Barkley, Jr., and files his Motion to Dismiss the above styled and numbered case; and in support thereof would most respectfully show unto this Honorable Court as follows:

1. That, the Debtors are \$3,584.58 delinquent in plan payments through September 2020.
2. That, all plan payments should be current on or before a hearing hereon or this case should be dismissed.
3. Other grounds to be shown at a hearing hereon.

WHEREFORE, PREMISES CONSIDERED, Trustee prays that this Motion be received and filed, and at a hearing hereon this Honorable Court will enter its Order sustaining Trustee's Motion, and for such other, further and general relief to which the Trustee and this bankruptcy estate may be entitled.

Dated: October 7, 2020

Respectfully submitted,

/s/Harold J. Barkley, Jr.

HAROLD J. BARKLEY, JR. - MSB #2008
CHAPTER 13 TRUSTEE
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CERTIFICATE

I, Harold J. Barkley, Jr., Trustee do hereby certify that I have this date mailed a true and correct copy of the foregoing pleading to the following parties by United States Mail, postage prepaid or by ECF Filing Notification:

Office of the U. S. Trustee
Ustpreion05.ja.ecf@usdoj.gov

Hon. Thomas C. Rollins, Jr.
trollins@therollinsfirm.com

Melvin Marshall Thaggard
Lacrystal April Rhynes
139 CR 503275
Rose Hill, MS 39356

Dated: October 7, 2020

/s/Harold J. Barkley, Jr.
HAROLD J. BARKLEY, JR.